

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants  
19 CHICAGO TITLE INSURANCE COMPANY and TICOR  
20 TITLE OF NEVADA, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652  
24 2950 E. Flamingo Road, Suite L  
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 US BANK, NATIONAL ASSOCIATION,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:21-CV-01186-APG-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT (ECF No. 1)**

**SECOND REQUEST**

29 COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and Ticor  
30 Title of Nevada, Inc. (“Ticor Agency”) (collectively “Defendants”) and plaintiff U.S. Bank,  
31 National Association (“U.S. Bank”), by and through their respective attorneys of record, which  
32 hereby agree and stipulate as follows:

1           1.       On June 21, 2021 U.S. Bank filed its complaint in the Eighth Judicial District  
2 Court for the State of Nevada;

3           2.       On June 22, 2021, Chicago Title removed the instant case to the United States  
4 District Court for the State of Nevada (ECF No. 1);

5           3.       Defendants' responses to U.S. Bank's complaint are currently due on August 23,  
6 2021 (ECF No. 15);

7           4.       Counsel for Defendants request a 30-day extension for for Defendants to file their  
8 respective responses to U.S. Bank's complaint, to afford Defendants' counsel additional time to  
9 review and respond to U.S. Bank's complaint.

10          5.       Counsel for U.S. Bank does not oppose the requested extension;

11          6.       This is the second request for an extension made by counsel for Defendants, which  
12 is made in good faith and not for the purposes of delay.

13          7.       This stipulation is entered into without waiving any of Defendants' objections  
14 under Fed. R. Civ. P. 12.

15               **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the  
16 complaint is hereby extended through and including Wednesday, September 22, 2021.

17 Dated: August 20, 2021

SINCLAIR BRAUN LLP

18 By: /s/-Kevin S. Sinclair

19 KEVIN S. SINCLAIR

Attorneys for Defendants

20 CHICAGO TITLE INSURANCE COMPANY  
and TICOR TITLE OF NEVADA, INC.

21 Dated: August 20, 2021

WRIGHT FINLAY & ZAK, LLP

22 By: /s/-Christina v. Miller

23 CHRISTINA V. MILLER

Attorneys for Plaintiff

24 U.S. BANK, NATIONAL ASSOCIATION

25 **IT IS SO ORDERED.**

26 DATED: August 23, 2021.

27 

28 BREND A WEKSLER

UNITED STATES MAGISTRATE JUDGE